

# Exhibit Q

**Summary Chart of Template Language used by the Government**

Date	Case	A. Unlawful Entry	B. Unaccompanied Minors	C. <i>Flores</i> Agreement	D. Executive Branch Directives	E. Subsequent Policy Changes
02/18/2022	A.E.S.E.	X	X	X	X	X
03/14/2022	A.F.P. and J.F.C.	X	X	X	X	X
03/17/2020	A.P.F.			X	X	
05/10/2021	B.A.D.J.	X	X	X	X	
01/07/2022	C.D.A.	X	X	X	X	
12/23/2019	C.M. (D. Ariz.)	X	X	X	X	
03/02/2022	C.M. (W.D. Tex.)	X	X	X	X	X
10/16/2020	D.A.	X	X	X	X	
10/16/2020	D.J.C.V.	X	X	X	X	
08/02/2022	E.C.B.	X	X	X	X	X
01/19/2021	E.L.A. and O.L.C.					
03/03/2022	E.S.M.	X	X	X	X	X
02/05/2022	F.R.	X	X	X	X	X
10/28/2022	F. Benitez	X	X	X	X	X
03/18/2021	Fuentes-Ortega	X	X	X	X	
06/29/2022	J.P.	X	X	X	X	
09/28/2020	Luna					
11/15/2022	M.S.E.	X	X	X	X	X
03/01/2021	N. Euceda	X	X	X	X	
01/05/2022	Wilbur P.G.	X	X	X	X	X
11/02/2020	R.Y.M.R.	X	X	X	X	
05/03/2021	S.E.B.M.	X	X	X	X	
06/22/2022	W.P.V. and W.P.O.	X	X	X	X	X

Date	Case / District / Number	Template Language
02/18/2022	<b>A.E.S.E</b>  D.N.M.  No. 2:21-cv-00569-SMV-GBW (ECF No. 31)	<p>II. FACTUAL AND LEGAL BACKGROUND</p> <p>A. Statutory framework for noncitizens entering the United States</p> <ul style="list-style-type: none"> <li>- Near verbatim copy: order of some sentences was shifted around, and a few sentences about “noncitizens with final order of removal” were not used in the motions filed in the case at bar.</li> </ul> <p>B. Statutory framework for immigration custody relating to unaccompanied minors</p> <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> <p>C. <i>Flores</i> agreement requirements</p> <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> <p>D. Executive Branch directives regarding immigration enforcement</p> <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> <p>G. Subsequent policy changes</p> <ul style="list-style-type: none"> <li>- Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.</li> </ul>
03/14/2022	<b>A.F.P. and J.F.C.</b>  E.D. Cal.  No. 1:21-cv-00780-DAD-EPG (ECF Nos. 15, 22)	<p>II. FACTUAL AND LEGAL BACKGROUND</p> <p>A. Statutory framework for noncitizens entering the country</p> <ul style="list-style-type: none"> <li>- Near verbatim copy: order of some sentences was shifted around and a few sentences about “noncitizens with final order of removal” were not used in the motions filed in the case at bar.</li> </ul> <p>B. Statutory framework for immigration custody of unaccompanied minors</p> <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> <p>C. <i>Flores</i> agreement requirements</p> <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> <p>D. Executive Branch directives regarding immigration enforcement</p> <ul style="list-style-type: none"> <li>- Near verbatim copy: a few minor word changes were made in the motions filed in the case at bar.</li> </ul> <p>F. Subsequent policy changes</p> <ul style="list-style-type: none"> <li>- Near verbatim copy: a few sentences were omitted, and the citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.</li> </ul>

03/17/2020	<b>A.P.F.</b>  D. Ariz.  No. 2:20-cv-00065-SRB (ECF No. 21)	<b>LEGAL FRAMEWORK</b>  II. Legal framework for the immigration custody and release of minor aliens - Similar discussion of “The <i>Flores</i> Settlement Agreement,” although not a verbatim copy.  III. Executive Branch directives regarding immigration enforcement - Near verbatim copy: an April 6, 2018 Presidential Memorandum entitled “Ending ‘Catch and Release’ at the Border of the United States and Directing Other Enhancements to Immigration Enforcement” is mentioned here but not in the motions filed in the case at bar.
05/10/2021	<b>B.A.D.J.</b>  D. Ariz.  No. 2:21-cv-00215 -SMB (ECF No. 27)	<b>RELEVANT BACKGROUND</b>  A. Legal framework for noncitizens entering the United States - Slightly different wording, but otherwise substantively the same as the language used in the motions filed in the case at bar. B. Legal framework for immigration custody relating to minors - First two paragraphs near verbatim copy to the language used in the motions filed in the case at bar. - <i>Flores</i> agreement mentioned in this section as opposed to a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar. C. Prior Executive Branch directives regarding immigration enforcement - Near verbatim copy.
01/7/2022	<b>C.D.A.</b>  E.D. Pa.  No. 5:21-cv-00469-EGS (ECF No. 29)	<b>I. BACKGROUND</b>  A. Legal framework for aliens entering the United States without authorization - Slightly different wording, but otherwise substantively the same as the language used in the motions filed in the case at bar. B. Legal framework for immigration custody and release of minors - First two paragraphs near verbatim copy. - <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar. C. Prior Executive Branch directives regarding immigration enforcement - Near verbatim copy.

12/23/2019	<b>C.M.</b> D. Ariz. No. 2:19-cv-05217-SRB (ECF No. 18)	<b>LEGAL FRAMEWORK</b> <ul style="list-style-type: none"> <li>I. Relevant immigration statutory and regulatory framework               <ul style="list-style-type: none"> <li>- Different wording, but substantively similar to the language used in the motions filed in the case at bar.</li> </ul> </li> <li>II. Legal framework for the immigration custody and release of minor aliens               <ul style="list-style-type: none"> <li>- Different wording, but substantively similar to the language used in the motions filed in the case at bar.</li> <li>- <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section.</li> </ul> </li> <li>III. Executive Branch directives regarding immigration enforcement               <ul style="list-style-type: none"> <li>- Near verbatim copy: an April 6, 2018, Presidential Memorandum entitled “Ending ‘Catch and Release’ at the Border of the United States and Directing Other Enhancements to Immigration Enforcement” is mentioned here but not in the motions filed in the case at bar.</li> </ul> </li> </ul>
03/02/2022	<b>C.M.</b> W.D. Tex. No. SA-21-CV-00234-JKP-ESC (ECF No. 22)	<b>II. RELEVANT IMMIGRATION FRAMEWORK</b> <ul style="list-style-type: none"> <li>A. Statutory framework for noncitizens entering the United States               <ul style="list-style-type: none"> <li>- Near verbatim copy of first paragraph used in the motions filed in the case at bar.</li> </ul> </li> <li>D. Statutory framework for immigration custody relating to unaccompanied minors               <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>E. <i>Flores</i> agreement requirements               <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>F. Executive Branch directives regarding immigration enforcement               <ul style="list-style-type: none"> <li>- Verbatim copy.</li> <li>- The April 6, 2018 “Memorandum for Federal Prosecutors along the Southwest Border” was not mentioned here, it is in Section D, third paragraph of the motion filed in the case at bar.</li> </ul> </li> <li>G. Subsequent policy changes               <ul style="list-style-type: none"> <li>- Contains substantively similar discussion of Biden’s Executive Order.</li> </ul> </li> </ul>

10/16/2020	<b>D.A.</b> N.D. Ill. No. 1:20-cv-03082 (ECF No. 73)	<b>LEGAL FRAMEWORK</b> <ul style="list-style-type: none"> <li>I. Legal framework for aliens entering the United States Unlawfully               <ul style="list-style-type: none"> <li>- Slightly different wording, but otherwise substantively the same as the language used in the motions filed in the case at bar.</li> </ul> </li> <li>II. Legal framework for immigration custody and release of minor aliens               <ul style="list-style-type: none"> <li>- First two paragraphs are a near verbatim copy.</li> <li>- The <i>Flores</i> agreement is mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar.</li> </ul> </li> <li>III. Executive Branch directives regarding immigration enforcement               <ul style="list-style-type: none"> <li>- Near verbatim copy: an April 6, 2018, Presidential Memorandum entitled “Ending ‘Catch and Release’ at the Border of the United States and Directing Other Enhancements to Immigration Enforcement” is mentioned here but not in the motions filed in the case at bar.</li> </ul> </li> </ul>
10/16/2020	<b>D.J.C.V.</b> S.D.N.Y. No. 1:20-cv-05747-PAE (ECF NO. 22)	<b>BACKGROUND</b> <ul style="list-style-type: none"> <li>III. Legal framework               <ul style="list-style-type: none"> <li>A. Relevant immigration statutory and regulatory framework                   <ul style="list-style-type: none"> <li>- Different wording, but substantively similar to the language used in the motions filed in the case at bar.</li> </ul> </li> <li>B. Legal framework for the immigration custody and release of minor aliens                   <ul style="list-style-type: none"> <li>i. The Homeland Security Act and the Trafficking Victims Protection Reauthorization Act</li> <li>- Different wording, but substantively similar to the language used in the motions filed in the case at bar.</li> <li>ii. The <i>Flores</i> settlement agreement                   <ul style="list-style-type: none"> <li>- Different wording, but substantively similar to the language used in the motions filed in the case at bar.</li> </ul> </li> </ul> </li> <li>C. Executive Branch directives regarding immigration enforcement                   <ul style="list-style-type: none"> <li>- Near verbatim copy: an April 6, 2018 Presidential Memorandum entitled “Ending ‘Catch and Release’ at the Border of the United States and Directing Other Enhancements to Immigration Enforcement” is mentioned here but not in the motions filed in the case at bar.</li> </ul> </li> </ul> </li> </ul>

08/02/2022	<b>E.C.B.</b>  D. Ariz.  No. 2:22-cv-00915-CDB (ECF No. 15)	II. FACTUAL AND LEGAL BACKGROUND <ul style="list-style-type: none"> <li>A. Statutory framework for noncitizens entering the United States <ul style="list-style-type: none"> <li>- Near verbatim copy: the order of some sentences was shifted around, and a few sentences about “noncitizens with final order of removal” were not used in the motions filed in the case at bar.</li> </ul> </li> <li>B. Statutory framework for immigration custody relating to unaccompanied minors <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>C. <i>Flores</i> agreement requirements <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>D. Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>G. Subsequent policy changes <ul style="list-style-type: none"> <li>- Near verbatim copy.</li> </ul> </li> </ul>
01/19/2021	<b>E.L.A. and O.L.C.</b>  W.D. Wash.  No. 2:20-cv-01524-RAJ (ECF No. 15)	Does not contain any of the template language
03/03/2022	<b>E.S.M.</b>  D. Ariz.  No. 4:21-cv-00029- JAS (ECF No. 35)	II. FACTUAL AND LEGAL BACKGROUND <ul style="list-style-type: none"> <li>A. Statutory framework for noncitizens entering the country <ul style="list-style-type: none"> <li>- Near verbatim copy.</li> </ul> </li> <li>B. Statutory framework for immigration custody relating to unaccompanied minors <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>C. <i>Flores</i> agreement requirements <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>D. Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>G. Subsequent policy changes <ul style="list-style-type: none"> <li>- Verbatim copy: citation to the “Interim Progress Report” was updated from Nov. 29, 2021 version to July 31, 2022 version in the motions filed in the case at bar.</li> </ul> </li> </ul>

02/05/2022	<b>F.R.</b>  D. Ariz.  No. 2:21-cv-00339-DLP (ECF No. 30)	<b>II. FACTUAL AND LEGAL BACKGROUND</b>  A. Statutory framework for noncitizens entering the United States - Near verbatim copy. B. Statutory framework for immigration custody relating to unaccompanied minors - Verbatim copy. C. <i>Flores</i> agreement requirements - Verbatim copy. D. Executive Branch directives regarding immigration enforcement - Verbatim copy. G. Subsequent policy changes - Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to July 31, 2022, version in the motions filed in the case at bar.
10/28/2022	<b>F. Benitez</b>  D. Conn.  No. 3:22-cv-884-JCH (ECF No. 35)	<b>FACTUAL AND LEGAL BACKGROUND</b>  A. Statutory framework for noncitizens entering the United States - Near verbatim copy. B. Statutory framework for immigration custody relating to unaccompanied minors - Verbatim copy. C. <i>Flores</i> agreement requirements - Verbatim copy. D. Executive Branch directives regarding immigration enforcement - Verbatim copy.  <b>SUBSEQUENT POLICY CHANGES</b> - Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.

03/18/2021	<b>Fuentes-Ortega</b>  D. Ariz.  No. 2:22-cv-00449-DGC (ECF No. 44)	II. BACKGROUND <ul style="list-style-type: none"> <li>A. Legal framework for aliens entering the United States unlawfully <ul style="list-style-type: none"> <li>- Slightly different wording, but otherwise substantively the same.</li> </ul> </li> <li>B. Legal framework for immigration custody and release of minors <ul style="list-style-type: none"> <li>- First two paragraphs are a near verbatim copy.</li> <li>- <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar.</li> </ul> </li> <li>C. Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Near verbatim copy: the April 6, 2018, “Memorandum for Federal Prosecutors along the Southwest Border”—Section D, third paragraph for the case at bar—was not mentioned in this motion.</li> </ul> </li> </ul>
06/29/2022	<b>J.P.</b>  D. Ariz.  No. 2:22-cv-00683-MTL (ECF No. 15)	RELEVANT BACKGROUND <ul style="list-style-type: none"> <li>A. Legal framework for noncitizens entering the United States <ul style="list-style-type: none"> <li>- Slightly different wording, but otherwise substantively the same.</li> </ul> </li> <li>B. Legal framework for immigration custody relating to minors <ul style="list-style-type: none"> <li>- First two paragraphs near verbatim copy.</li> <li>- <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar.</li> </ul> </li> <li>C. Prior Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Near verbatim copy.</li> </ul> </li> </ul>
09/28/2020	<b>Luna</b>  W.D. Wash.  No. 2:20-cv-01152-RSL (ECF No. 5)	Does not contain any of the template language.

11/15/2022	<b>M.S.E.</b>  D. Ariz.  No. 2:22-cv-01242-SMM (ECF No. 21)	II. Factual and legal background  A. Statutory framework for noncitizens entering the United States - Near verbatim copy. B. Statutory framework for immigration custody relating to unaccompanied minors - Verbatim copy. C. <i>Flores</i> agreement requirements - Verbatim copy. D. Executive Branch directives regarding immigration enforcement - Verbatim copy. G. Subsequent policy changes - Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.
03/01/2021	<b>Nunez Euceda</b>  C.D. Cal.  No. 2:20-cv-10793-VAP- GJSx (ECF No. 11)	II. BACKGROUND  A. Legal framework for aliens entering the United States unlawfully - Slightly different wording, but otherwise substantively the same. B. Legal framework for immigration custody and release of minors - First two paragraphs near verbatim copy. - <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar. C. Prior Executive Branch directives regarding immigration enforcement - Near verbatim copy.

01/05/2022	<b>Wilbur P.G.</b>  N.D. Cal.  No. 4:21-cv-4457-KAW (ECF No. 29)	II. FACTUAL AND LEGAL BACKGROUND  A. Statutory framework for noncitizens entering the country - Near verbatim copy. B. Statutory framework for immigration custody relating to unaccompanied minors - Verbatim copy. C. <i>Flores</i> agreement requirements - Verbatim copy. D. Executive Branch directives regarding immigration enforcement - Verbatim copy. G. Subsequent policy changes - Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.
11/02/2020	<b>R.Y.M.R.</b>  S.D. Fla.  No. 1:20-cv-23598-KMW (ECF No. 12)	LEGAL FRAMEWORK  I. Legal framework for aliens entering the United States Unlawfully - Slightly different wording, but otherwise substantively the same as the language used in the motions filed in the case at bar. - January 2017 Executive Order discussion included in this section instead of creating a separate section.  II. Legal framework for immigration custody and release of minor aliens - First two paragraphs are a near verbatim copy. - <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar.

05/03/2021	<b>S.E.B.M.</b>  D.N.M.  No. 21-cs-00095-JHR-LF (ECF No. 16)	BACKGROUND <ul style="list-style-type: none"> <li>A. Legal framework for aliens entering the United States unlawfully <ul style="list-style-type: none"> <li>- Slightly different wording, but otherwise substantively the same as the language used in the motions filed in the case at bar.</li> </ul> </li> <li>B. Legal framework for immigration custody and release of minors <ul style="list-style-type: none"> <li>- First two paragraphs near verbatim copy.</li> <li>- <i>Flores</i> agreement mentioned in this section as opposed to creating a separate section. The last paragraph discussing the <i>Flores</i> agreement is a near verbatim copy of the language used in the motions filed in the case at bar.</li> </ul> </li> <li>C. Prior Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Near verbatim copy. Additionally, this motion discusses a June 20, 2018, Executive Order that none of the other MTDs mention.</li> </ul> </li> </ul>
06/22/2022	<b>W.P.V. and W.P.O.</b>  S.D.N.Y.  1:21-cv-04436-JPC (ECF No. 67)	II. FACTUAL AND LEGAL BACKGROUND <ul style="list-style-type: none"> <li>A. Statutory framework for noncitizens entering the country <ul style="list-style-type: none"> <li>- Near verbatim copy.</li> </ul> </li> <li>B. Statutory framework for immigration custody of unaccompanied minors <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>C. <i>Flores</i> agreement requirements <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>D. Executive Branch directives regarding immigration enforcement <ul style="list-style-type: none"> <li>- Verbatim copy.</li> </ul> </li> <li>F. Subsequent policy changes <ul style="list-style-type: none"> <li>- Verbatim copy: citation to the “Interim Progress Report” was updated from the November 29, 2021, version to the July 31, 2022, version in the motions filed in the case at bar.</li> </ul> </li> </ul>